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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS & ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No.: 19-30088-DM

Chapter 11

**DECLARATION OF TODD GREENBERG  
IN SUPPORT OF RESPONSE BY TODD  
GREENBERG TO REORGANIZED  
DEBTORS' FORTIETH OMNIBUS  
OBJECTION TO CLAIMS (NO LIABILITY  
/ PASSTHROUGH CLAIMS)**

Date: December 15, 2020

Time: 10:00 a.m.

Place: (Telephonic Appearances Only)  
Courtroom 17

450 Golden Gate Avenue, 16<sup>th</sup> Floor

San Francisco, California

Judge: Hon. Dennis Montali

I, Todd Greenberg, declare as follows:

1. I am over the age of 18 and the following facts are personally known to me, and if called to do so, I could and would competently testify thereto.

2. I make this declaration in support of my response to the Reorganized Debtors' Fortieth Omnibus Objections to Claims.

3. On October 21, 2019, I caused to be filed with Prime Clerk three proofs of claim

1 against Pacific Gas & Electric Company (“PG&E”) numbered (by Prime Clerk) as Claim Numbers  
2 77335 (for \$37,635.04), 78381 (for \$209,694.09), and 76018 (for \$299,228.89).

3 4. Claim no. 77335, which is the subject of the Fortieth Omnibus Objection, concerned  
4 damage to a refrigerator, its contents, and an interior floor, located in the downstairs flat in a  
5 building owned by my family at 47 Bolinas Road, Fairfax, CA 94930. I lived in this flat at the time  
6 of the incident, but have since moved into the other unit.

7 5. The damage to my refrigerator occurred sometime between February 14, 2016 and  
8 February 21, 2016, when my entire family was away on vacation for my father's 80th birthday.  
9 During this time, electrical power fluctuations—outages followed by surges—caused the starter  
10 relay in the refrigerator and freezer to fail, as diagnosed by the Appliance Repair Doctor of Alameda,  
11 California. This failure, while not affecting other refrigerator mechanicals, prevented the  
12 refrigerator freezer from functioning, and everything inside melted and spoiled, and then leaked onto  
13 the slightly outward sloping floor, so it spread across the entire kitchen. Upon my return home, I  
14 discovered the horrible spoiled melted food mess and the worst smell I've ever experienced.

15 6. At the time of the incident, PG&E had crews working on installing a three-phase  
16 power upgrade next door, at 31 Bolinas Road, and along Bolinas Road, for a newly built/being built  
17 restaurant location, which is a mixed use, commercial/residential complex that underwent an  
18 extensive renovation. At the time, I was told by PG&E crew members that the upgrade of the power  
19 to three-phase power was the cause of one of the many power outages, fluctuations, and related  
20 surges, including when a nearby pole transformer blew.

21 7. I was also informed by the Town Manager, Garret Toy, of the difficulties PG&E  
22 encountered while endeavoring to provide the 3 phase power next door at 31 Bolinas. These  
23 difficulties included needing to have traffic control and shutting down parts of the street, blowing of  
24 pole transformers, subsequently necessary replacements of many power provision components,  
25 many unanticipated delays, and disruptions related to the age of the existing power provision  
26 equipment.

27 8. As indicated in my proof of claim, the appliance repair company replaced the starter  
28 relay, which had been burnt out by a power surge that could only have been caused by PG&E.

